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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

HAIR CLUB FOR MEN, LLC, a
Delaware limited liability company,

Plaintiff,

vs.

MARIA TERESA DE LA PAZ, an
individual,

Defendant.

Case No. CV 11-02762-GW(JEMx)

PRELIMINARY INJUNCTION

Complaint Filed: March 31, 2011
Trial Date: None Set

1 On September 7, 2011, Plaintiff Hair Club for Men, LLC (“Hair Club”)
2 applied for a default judgment against Defendant Maria Teresa De La Paz
3 (“Defendant”). Hair Club’s Application for Default Judgment by Court Against
4 Defendant and Request for Attorneys’ Fees to Be Fixed by Court came on regularly
5 for hearing on October 20, 2011, at 8:30 a.m., in Courtroom 10 of the above-
6 entitled Court, the Honorable George H. Wu presiding.

7 The Court, having considered all papers filed in support of and opposition to
8 the Application for Default Judgment by Court Against Defendant and Request for
9 Attorneys’ Fees to Be Fixed by Court, the evidence submitted in support thereof,
10 the pleadings and materials on file in this matter, and arguments of the parties
11 and/or their counsel, issues the following preliminary injunction:

12 **IT IS HEREBY ORDERED** that Defendant is preliminarily enjoined from
13 the following:

- 14 1. using, disclosing, or otherwise misappropriating any of Hair Club’s
15 trade secrets or other confidential or proprietary information,
16 including, but not limited to, the following:
 - 17 (a) specialized Hair Club proprietary technological information
18 concerning hair replacement services developed by Hair Club
19 which Defendant gained and/or learned as a result of her
20 employment with Hair Club and are not commonly known in the
21 industry;
 - 22 (b) the names, contacts, addresses, phone numbers, and email
23 addresses of Hair Club’s past or present customers or clients
24 who Defendant met while employed by Hair Club in the course
25 of providing services to Hair Club. For the purposes of this
26 Order, Defendant is not enjoined from using this information for
27 the purpose of announcing her employment or self-employment;
 - 28 (c) the names, contacts, addresses, phone numbers, and email

- addresses of prospective Hair Club customers or clients who Defendant met while employed by Hair Club in the course of providing services to Hair Club. For purposes of this Order, Defendant is not enjoined from using this information for the purpose of announcing her employment or self-employment;
- (d) information on Hair Club's past, present, or prospective customers or clients, including their requirements, specifications, and purchasing histories;
 - (e) Hair Club pricing and cost methodologies;
 - (f) techniques and procedures developed by Hair Club which are not commonly known in the industry, including those for hair replacement services; and
 - (g) Hair Club's technical training and product information which is not commonly known in the industry;
2. from directly or indirectly soliciting any Hair Club customers whose identities are known to Defendant as a result of her employment with Hair Club; and
 3. from directly or indirectly soliciting any Hair Club employees.

IT IS SO ORDERED.

Date: November 17, 2011



Honorable George H. Wu
United States District Judge